

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

<p>AQUATECH INTERNATIONAL CORPORATION, a Pennsylvania corporation, and DEBASISH MUKHOPADHYAY, an individual,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>N.A. WATER SYSTEMS, LLC, a Pennsylvania Limited Liability Company; and VEOLIA WATER SOLUTIONS & TECHNOLOGIES SUPPORT, a French Corporation,</p> <p>Defendants.</p>	<p>Civil Action No.: 2:12-cv-00435</p> <p>Judge Joy Flowers Conti</p> <p>P.A. # 7,815,804 B2 5,925,255 6,537,456</p>
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SECOND AMENDED COMPLAINT

Aquatech International Corporation (hereinafter "Aquatech") and Debasish Mukhopadhyay (hereinafter collectively "Plaintiffs" or "the Aquatech Plaintiffs") bring this action for declaratory judgment relating to Defendants' N.A. Water Systems, LLC and Veolia Water Solutions & Technologies Support (hereinafter collectively "the VWSTS Defendants") U.S. Patent No. 7,815,804 B2 (hereinafter "the '804 OPUS Patent"). (Exhibit "1" hereto.)

PARTIES

1. Aquatech is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, and has its principal place of business in Washington County, Pennsylvania. Aquatech is an exclusive licensee of the HERO Patents.

2. Debasish Mukhopadhyay (hereinafter “Deb”) is an individual residing in the State of California. Deb is the owner, and licensor, of U.S. Patent Nos. 5,925,255 (the “255 patent”) and 6,537,456 (the “456 patent”) (collectively, the “HERO Patents”). (Exhibits “2” and “3” respectively.)

3. Upon information and belief, N.A. Water Systems, LLC (“NAWS”) is a Pennsylvania limited liability company and a direct subsidiary of Veolia Water Solutions & Technologies North America, Inc. and has its principal place of business at Airside Business Park, 250 Airside Drive, Moon Township, PA 15108.

4. Upon information and belief, Veolia Water Solutions & Technologies Support (“VWSTS”) is a privately-held joint-stock company with limited liability (Societe anonyne), organized and existing under the laws of France, having its registered head office at L’Aquarene, 1, place Montgolfier, 94417 Saint-Maurice, France.

5. Upon information and belief the VWSTS Defendants purport to be the assignees of all right, title, and interest in and to the ‘804 Patent.

JURISDICTION AND VENUE

6. This action arises under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*, and the Declaratory Judgment act, 28 U.S.C. §§ 2201 and 2202.